REMARKS

The following remarks are being submitted as a full and complete response to the Office Action dated May 11, 2007. In view of the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

Status of the Claims

As outlined above, claims 1 and 4-6 stand for consideration in this application, wherein claim 1 is being amended to more particularly point out and distinctly claim the subject invention, and claims 2-3 were canceled without prejudice or disclaimer. Claims 7-22 stand withdrawn from consideration in this application.

Prior Art Rejections

Claims 1 and 5-6 were rejected under 35 U.S.C. §102(b) as being anticipated by Katayama et al. (U.S. Pat. No. 5,151,807). Further, claim 4 was rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Katayama in view of Liu et al. (US Patent No. 5,518,956). Applicants have reviewed the above rejections, and respectfully traverse for the reasons set forth below.

The present invention as recited in claim 1 is directed to a display device forming a display region where a plurality of films including an insulation film, a semiconductor film and a conductive film are patterned in a given pattern and stacked on a substrate, wherein at a point of time that at least one correction portion out of a correction portion which separates a short-circuit defect, a correction portion which connects an opening defect, a correction portion which removes a standard deviation defect, and a correction portion which separates a standard deviation defect of the pattern is corrected, at least one upper-layer film is formed above a film to be corrected at the correction portion and the correction is applied to the film to be corrected the upper-layer film while the upper-layer remains. The correction of the correction portion is performed by the irradiation of a laser beam through the at least one upper layer film from a side of the at least one upper layer film opposite the substrate and not through a substrate.

The features of present invention as recited in claim 1 include a display device in which, even when a protective film, an insulation film or the like is present above a film containing a defect to be corrected, defects in the display can be eliminated by correcting

only the defect of the lower-layer film containing the defect without removing the upper-layer film.

In contrast, Katayama shows in Fig. 15 that laser beams 136, 137 are irradiated from a lower side of the glass substrate 101. Katayama further states that although the laser beam is radiated from the glass substrate 101 side, it can be radiated from any substrate if both substrates are made of a material through which laser beams can be transmitted (col. 20, lines 32-36). In other words, Katayama shows that laser beams are irradiated via a substrate 120 or the substrate 101. As such, Katayama cannot and does not show or suggest any structure or operation that would anticipate each and every feature of the present invention as claimed.

Even more, since Katayama teaches that a laser beam can be radiated from any substrate, Applicants will contend that Katayama in actuality teaches away from the present invention as claimed. Applicants will contend that it is well established that a prior art reference must be evaluated in its entirety, and it is improper to selectively pick and choose teachings out of a reference in order to support a prior art rejection. See *Panduit Corp. v. Dennison Mfg. Co.*, 227 USPQ 337, 344 (Fed. Cir. 1985). See *Para-Ordinance Mfg, Inc. v. SGS Importers Intl.*, Inc., 73 F.3d 1085, 37 USPQ2d 1237 (Fed. Cir. 1995). It is also well established that a prior art rejection based on a principle that contradicts the structure and operation of the cited reference is also improper. In other words, since Katayama teaches that a laser can be radiated from any substrate, it clearly contradicts the present invention wherein, among other features, correction of the correction portion is performed by the irradiation of a laser beam through the at least one upper layer film from a side of the at least one upper layer film opposite the substrate and not through a substrate. Thus, the present invention as recited in claim 1 is distinguishable and thereby allowable over Katayama.

As to dependent claims 5-6, the arguments set forth above with respect to independent claim 1 are equally applicable here. The corresponding base claim being allowable, claims 5-6 must also be allowable.

With respect to claim 4, the secondary reference of Liu was merely cited for showing a feature recited in a dependent claim. As set forth above, Katayama by itself fails to show all the elements recited in claim 1.

Though Liu shows radiating a laser beam via no substrate, Liu states that a portion of the energy in the laser beam of ultraviolet light is absorbed in the ITO of common electrode layer 116, and substantially all of the remaining portion of the beam's energy is readily absorbed in the polyimide of dielectric layer 114, and that the absorption of the light by the ITO and the underlying polyimide results in the ablation of the illuminated surfaces (col. 4,

lines 38-44). In other words, Liu shows that while the defect 118 is ablated, upper layer film of a defect 118 is also ablated. This feature is completely different from the feature recited in claim 1, namely, that the correction is applied to the film to be corrected the upper-layer film while the upper-layer remains.

Furthermore, there is no suggestion or motivation in either Katayama or Liu to combine their features explicitly or implicitly to embody all the features of the present invention as recited in either claim 1 or claim 4. As a matter of fact, since Katayama as discussed discloses hat a laser can be radiated from any substrate, it clearly contradicts the disclosure of Liu where a laser is radiated via no substrate. A rejection based on prior art references whose principles contradict each other is clearly improper. Accordingly, claim 4 is not obvious in view of all the prior art recited.

Conclusion

In view of all the above, Applicants respectfully submit that certain clear and distinct differences as discussed exist between the present invention as now claimed and the prior art references upon which the rejections in the Office Action rely. These differences are more than sufficient that the present invention as now claimed would not have been anticipated nor rendered obvious given the prior art. Rather, the present invention as a whole is distinguishable, and thereby allowable over the prior art.

Favorable reconsideration of this application is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicants' undersigned representative at the address and phone number indicated below.

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